

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DOUGLAS AND SYLVIA MORRISON)	
)	
COMPLAINANT)	
V.)	CASE NO.
)	2015-00136
KENTUCKY POWER COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO DOUGLAS AND SYLVIA MORRISON

Douglas and Sylvia Morrison ("Mr. and Mrs. Morrison"), pursuant to 807 KAR 5:001, are to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 23, 2015. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Mr. and Mrs. Morrison shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Mr. and Mrs. Morrison fail or refuse to furnish all or part of the requested information, Mr. and Mrs. Morrison shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Mr. and Mrs. Morrison shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information, including but not limited to, customer account numbers, cannot be read.

1. Provide photographs of the outdoor light attached to the shed located at 440 31st Street, Ashland, Kentucky, that is at issue in this matter. The photographs should clearly portray the outdoor light attached to the shed, including, but not limited to, close up views of the outdoor light from viewpoints up from the ground underneath the light and up from the ground to each side of the light.

2. State whether you, individually or jointly, contacted Kentucky Power to clarify, question or dispute any charges on the monthly statement you received for combination electric/outdoor lighting service at 440 31st Street, Ashland, Kentucky, between April 9, 1996, when your electric service was established, and March 2015. If contact was made, provide copies of all records documenting the dispute, along with

any documents showing whether the dispute was resolved, and if so, how it was resolved.

3. Refer to the Complaint, paragraph 1, where you discuss repairs and replacement of the outdoor light attached to the shed.

a. Provide the dates when Kentucky Power replaced the outdoor light over the shed.

b. Provide copies of any documents, photographs, or other records regarding your contention that Kentucky Power twice replaced the outdoor light over the shed.

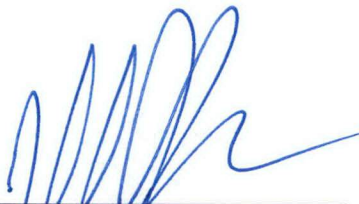
c. Provide the date when Kentucky Power repaired the outdoor light over the shed.

d. Provide copies of any documents, photographs, or other records regarding your contention that Kentucky Power previously repaired the outdoor light over the shed.

4. Refer to the Complaint, paragraphs 3, 10, and 19. Provide copies of any correspondence, documents, or other records regarding your complaints about and efforts to remove the outdoor light attached to Kentucky Power Pole No. 2184. Include in your response any communication you had with Kentucky Power and any communication Kentucky Power had with you regarding your complaints about the outdoor light attached to Kentucky Power Pole No. 2184.

5. Refer to the Complaint, page 14. Provide copies of photographs or any other records that demonstrate that outdoor lighting was formerly installed on Kentucky Power Pole No. 2182.

6. Refer to the Complaint, page 15, and Kentucky Power's Answer at paragraph 5(g). Explain in specific detail the basis for your statement that the outdoor light attached to your shed is identical to the outdoor light attached to Kentucky Power Pole No. 2184.



Jeff DeJouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **MAY 27 2015** _____

cc: Parties of Record

*Kentucky Power Company
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Frankfort, KY 40602

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